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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FELIPE ROMERO, JOSE PANI,  
JUSTINO ROMERO, PLACIDO  
ROMERO, JUAN JOSE ROMERO,  
IRMA JUAREZ, GERMAN ROMERO,  
BULMARO ARENAS, ALTAGRACIA  
MERCED AND MARIA CORONA, on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

-vs-

FLAUM APPETIZING CORP., MOSHE  
GRUDHUT, and "UNKNOWN FLAUM  
MANAGERS 1-5"(Names Being  
Fictitious),

Defendants.

Civil Action No. 07-cv-7222

**NOTICE OF MOTION**

To: Jeffrey A. Meyer, Esq.  
KAUFFMAN, DOLOWICH & VOLUCK, LLP  
135 Crossways Park Drive, Suite 201  
Woodbury, NY 11797

**PLEASE TAKE NOTICE THAT** at such date and time as the Court may direct, plaintiffs will move the Hon. James C. Francis, U.S.M.J., for the entry of an Order pursuant to Fed.R.Civ.P. 4(d)(5), granting plaintiffs' motion for certification of this matter as a collective action pursuant to

29 U.S.C. § 216(b), and an Order granting plaintiffs' motion compelling defendants to produce identifying information about its current and former hourly employees as well as an Order permitting plaintiffs to publish and send Notice of this matter to all prospective plaintiffs. In support thereof, plaintiffs submit a brief and Certifications of plaintiffs and a proposed form of Order.

Oral argument is requested.

**PLEASE TAKE FURTHER NOTICE** that unless timely responsive papers are filed and served, the Court may enter the proposed form of Order without further notice to you.

Dated: August 29, 2008

s/  
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